

DANIL EZEKIEL FAUST
aka Dañilo Augusto Feliciano
GENERAL DELIVERY
Washington, DC 20018
SSN# XXX-XX-5866
Plaintiff

vs

STATE OF LOUISIANA
Defendant

Case #:
COMPLAINT

NOW COMES DANIL EZEKIEL FAUST, also known as Dañilo Augusto Feliciano, one of the people, (hereinafter “the Plaintiff”) and files in this court of record this Motion for Summary Judgment on all counts in the Complaint involving the Production of Documents required by federal law, and request for declaratory and injunctive relief pursuant to Fed. R. Civ. P. 56

1. Plaintiff is entitled to summary judgment on claim 1 and 2.

1. The Defendant, through the Secretary of State, submitted claims for payment to the United States Government with full knowledge that such claims were false, despite repeated warnings from the Plaintiff. The key element, namely the permanent paper record, cannot be proven to exist by the Defendant based upon public statements and multiple reports, and thus claims for payment submitted can be construed as in violation of 31 U.S.C. §3729 False claims
2. Plaintiff is entitled to summary judgment on claim 3
 1. The Defendant, through the Secretary of State, did not keep records as required by law, for the reason that such records never existed, in violation of 52 U.S.C. §20701: Retention and

preservation of records and papers by officers of elections; deposit with custodian; penalty for violation.

CONCLUSION

Because the Plaintiff's evidence, viewed in the light most favorable to this complaint, is sufficient to establish all of the elements of the claims and thus the Plaintiff is entitled to summary judgment on all claims. In addition, the undisputed evidence indicates that the Defendants have stated publicly and submitted documents that prove their knowledge the statutes and their acts contrary to those statutes, denying them to any defense against the claims of the Plaintiff.

DATED: 16 March 2023

Respectfully submitted,

DANIL EZEKIEL FAUST
aka Danilo A. Feliciano
GENERAL DELIVERY
WASHINGTON, DC 20090
daniloafeliciano@gmail.com